



Communication Solutions Partners, Inc.

February 12, 2010

Federal Communications Commission
445 12th Street, SW
Suite TW-A325
Washington, DC 20554

Attention: Marlene H. Dortch
Office of the Secretary

Subject: Annual 64.2009(e) CPNI Certification for 2009
EB Docket No. 06-36
Reporting Company – Communication Solutions Partners, Inc.
Form 499 Filer ID: 823256

I, Paul Whalley, certify that I am an officer of Communication Solutions Partners, Inc. (CSP), and acting as an agent of the company, that I have personal knowledge that CSP has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how CSP's procedures ensure that we are in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

Furthermore, I certify that CSP has not taken any actions, i.e., proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers in the past year, and that CSP has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Please contact me at (413) 569-4240, or at pw@wca.com if you have any questions related to the information being provided.

Sincerely,
Communication Solutions Partners, Inc.

Paul Whalley
President



Communication Solutions Partners, Inc.

Original: Filed via Electronic Comment Fling System

cc: Two (2) courtesy copies - Commercial Overnight Mail to:

Federal Communications Commission
Enforcement Bureau
Telecommunications Consumers Division
445 12th Street SW
Washington, DC 20554

cc: One (1) copy - E-mail to:

fcc@bcpiweb.com
Best Copy and Printing, Inc.
445 12th Street
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Washington, DC 20554



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Accompanying Statement to Annual CPNI Compliance Certification for Communication Solutions Partners, Inc.

In compliance with 47 C.F.R. § 64.2009(e), I, Paul Whalley, acting on behalf of Communication Solutions Partners, Inc., certify that the Company has taken the following actions:

Employee Training and Discipline

- Trained all CSP employees and personnel as to when they are and are not authorized to use CPNI.
- Instituted an express disciplinary process for unauthorized use of CPNI.

Sales and Marketing Campaign Approval

- Guaranteed that all CSP sales and marketing campaigns are approved by designated CSP management.

Record-Keeping Requirements

- Established a system to maintain a record of all CSP sales and marketing campaigns that use our customers' CPNI, including marketing campaigns of affiliates and independent contractors.
- Ensured that these records include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign.
- Made certain that these records are maintained for a minimum of one (1) year.

Establishment of a Supervisory Review Process

- Established a supervisory review process for all outbound marketing situations.
- Certified that under this review process, all CSP sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval.



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Opt-In

- Guaranteed that CSP only discloses CPNI to agents, affiliates, joint venture partners, independent contractors or to any other third parties only after receiving "opt-in" approval from a customer.
- Verified that CSP enters into confidential agreements with joint venture partners, independent contractors or any other third party when releasing CPNI.

Opt-Out Mechanism Failure

- Established a protocol through which CSP will provide the FCC with written notice within five (5) business days of any instance where opt-out mechanisms do not work properly, to such a degree that consumers' inability to opt-out is more than an anomaly.

Compliance Certificates

- Executed a statement, signed by Paul Whalley, President of CSP that he has personal knowledge that CSP has established operating procedures that are adequate to ensure compliance with the FCC's CPNI regulations.
- Executed a statement detailing how operating procedures ensure compliance with CPNI regulations.
- Executed a summary of all customer complaints received in the past year concerning unauthorized release of CPNI.

Customer Authentication Methods

- Instituted customer authentication methods to ensure adequate protection of customers' CPNI. These protections only allow CPNI disclosure in accordance with the following methods:
 - Disclosure of CPNI information in response to a customer providing a pre-established password;
 - Disclosure of requested CPNI to the customer's address or phone number of record; and



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- Access to CPNI if a customer presents a valid photo ID at the carrier's retail location.

Customer Notification of CPNI Changes

- Established a system under which a customer is notified of any change to CPNI. This system, at minimum, notifies a customer of CPNI access in the following circumstances:
 - password modification,
 - a response to a carrier-designed back-up means of authentication,
 - online account changes, or
 - address of record change or creation.

Notification to Law Enforcement and Customers of Unauthorized Access

- Established a protocol under which the appropriate Law Enforcement Agency ("LEA") is notified of any unauthorized access to a customer's CPNI.
- Ensured that all records of any discovered CPNI breaches are kept for a minimum of two (2) years.

Paul Whalley
President

2/12/10

Date: